

Ann-Elizabeth Ostrager (admitted *pro hac vice*)  
James M. McDonald (admitted *pro hac vice*)  
SULLIVAN & CROMWELL LLP  
125 Broad Street  
New York, New York 10004  
(212) 558-4000  
ostragerae@sullcrom.com  
mcdonaldj@sullcrom.com

*Attorneys for Defendant*  
*Catherine Coley*

[Additional Counsel on Signature Page.]

**IN THE UNITED STATES DISTRICT COURT**  
**FOR THE DISTRICT OF ARIZONA**

Ryan Cox, individually and on behalf  
of all others similarly situated;

Plaintiff,

v.

CoinMarketCap OpCo, LLC; Binance  
Capital Management Co., Ltd. d/b/a  
Binance and Binance.com; BAM  
Trading Services Inc. d/b/a  
Binance.US; Changpeng Zhao;  
Catherine Coley; Yi He; Ted Lin; and  
Does I-X;

Defendants.

Case No.: 21-cv-08197-PCT-SMB

**JOINT STIPULATION FOR  
SCHEDULING ORDER**

1 Plaintiff Ryan Cox (“Plaintiff”) and Defendant Catherine Coley (the “Defendant” and,  
2 together with Plaintiff, the “Parties”), by and through their undersigned counsel of record,  
3 respectfully submit this Joint Stipulation for Scheduling Order, as follows:

4 WHEREAS, on September 13, 2021, Plaintiff filed a putative class action complaint (the  
5 “Complaint”) in the above-referenced action (the “Action”);

6 WHEREAS, on March 24, 2022, Plaintiff completed service of the Complaint on  
7 Defendant; and

8 WHEREAS, counsel for the Parties having conferred regarding a schedule for responding  
9 to the Complaint, the Parties agree that a coordinated briefing schedule for any motion(s) to dismiss  
10 will best facilitate the just and efficient progress of the Action and use of this Court’s and the  
11 Parties’ resources.

12 NOW, THEREFORE, the Parties hereby stipulate and agree, subject to the Court’s  
13 approval as follows:

14 1. The deadline for Defendant to respond to the Complaint shall be sixty (60 days)  
15 after the date that service of the Complaint upon Defendant was perfected.

16 2. Should Defendant move to dismiss the Complaint, Plaintiff shall file his opposition  
17 to the motion to dismiss within sixty (60) days of the filing of the motion to dismiss; and Defendant  
18 shall file a reply brief within thirty (30) days of the filing of Plaintiff’s opposition.

19 3. Defendant does not waive any of her respective rights and defenses, including,  
20 without limitation, any and all jurisdictional, venue, or forum-related rights and defenses, by  
21 agreeing to and/or filing this Joint Stipulation for Scheduling Order.

22 **IT IS SO STIPULATED.**  
23  
24  
25  
26  
27  
28

1 Dated: April 11, 2022

/s/ Ann-Elizabeth Ostrager  
Ann-Elizabeth Ostrager (admitted *pro*  
*hac vice*)  
James M. McDonald (admitted *pro hac*  
*vice*)  
SULLIVAN & CROMWELL LLP  
125 Broad Street  
New York, New York 10004  
(212) 558-4000  
ostragerae@sullcrom.com  
mcdonaldj@sullcrom.com  
*Attorneys for Defendant*  
*Catherine Coley*

9 Dated: April 11, 2022

/s/ George Wentz, Jr.  
George Wentz, Jr. (admitted *pro hac*  
*vice*)  
THE DAVILLIER LAW GROUP, LLC  
414 Church St., Suite 308  
Sandpoint, ID 83864  
(208) 920-6140  
gwentz@davillierlawgroup.com

Alexander Kolodin  
THE DAVILLIER LAW GROUP, LLC  
3443 N. Central Ave., Suite 1009  
Phoenix, AZ 85012  
(602) 730-2985  
akolodin@davillierlawgroup.com  
*Attorneys for Plaintiff*  
*Ryan Cox*

**CERTIFICATE OF SERVICE**

I hereby certify that on April 11, 2022, I electronically submitted the foregoing document to the Clerk's Office using the CM/ECF system for filing and transmittal of a Notice of Electronic Filing to the CM/ECF registrants on record.

Dated: April 11, 2022

/s/ Ann-Elizabeth Ostrager

Ann-Elizabeth Ostrager (admitted  
*pro hac vice*)

James M. McDonald (admitted *pro*  
*hac vice*)

SULLIVAN & CROMWELL LLP

125 Broad Street

New York, New York 10004

(212) 558-4000

ostragerae@sullcrom.com

mcdonaldj@sullcrom.com

*Attorneys for Defendant*

*Catherine Coley*